

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
LAKETHIA LEE, v. L'OREAL USA, INC.; L'OREAL USA PRODUCTS, INC.; SOFTSHEEN-CARSON LLC; ET AL.	SHORT-FORM COMPLAINT AND JURY DEMAND Civil Action No. 1:24-cv-03414

1. Plaintiff(s)/Injured Party/Decedent (hereinafter, "Plaintiff(s)") incorporate by reference Plaintiffs' Master Long Form Complaint in *In Re: Hair Relaxer Marketing, Sales Practices and Products Liability Litigation*, MDL 3060, filed as of May 15, 2023, as Document Number 106.

2. Plaintiff(s), Lakethia Lee, file(s) this Complaint pursuant to CMO No. 2 and is to be bound by the rights, protections and privileges, and obligations of that CMO and other Orders of the Court. Further, in accordance with CMO No. 2, Plaintiff(s) hereby designate(s) the United States District Court for the Western District of Louisiana as Plaintiff's designated venue ("Original Venue"). Plaintiff makes this selection based upon one (or more) of the following factors (please check the appropriate box(es)):

 X Plaintiff currently resides in Boyce, LA;

 X Plaintiff purchased and used Defendant(s)' products in Boyce, LA;

 The Original Venue is a judicial district in which Defendant _____ resides, and all defendants are residents of the State in which the district is located (28 U.S.C. § 1391(b)(1)).

X The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)): Plaintiff's product purchase and use, as well as diagnosis and treatment of injury.

There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant _____ is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)).

Other reason (please explain): _____.

3. For purposes of diversity jurisdiction, Plaintiff is a citizen of LA.

4. Plaintiff is suing the following Defendants, and for purposes of diversity, whose

State of Incorporation/Formation and Principal Place of Business is as follows:

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
	AFAM Concept, Inc. d/b/a JF Labs, Inc.	Illinois	Illinois
	Avlon Industries, Inc.	Illinois	Illinois
X	Beauty Bell Enterprises LLC f/k/a House of Cheatham, Inc.	Georgia	Georgia
	Dabur International Ltd.	Isle of Man	Dubai
	Dabur International USA Ltd.	India	Illinois
	Dermoviva Skin Essentials, Inc.	Delaware	New Jersey
	Godrej SON Holdings, Inc.	Georgia	Georgia
X	House of Cheatham LLC	Delaware	Georgia
X	L'Oréal USA, Inc.	Delaware	New York
X	L'Oréal USA Products, Inc.	Delaware	New York
X	Luster Products, Inc.	Illinois	Illinois
	McBride Research Laboratories, Inc.	Georgia	Georgia
	Namaste Laboratories LLC	Illinois	Illinois
	Revlon Consumer Products Corporation	Delaware	New York
	Revlon Group Holdings LLC	Delaware	Delaware

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
	Revlon, Inc.	Delaware	New York
X	SoftSheen-Carson LLC	New York	New York
	Strength of Nature, LLC	Georgia	Georgia
	Other (Please identify):	_____	_____
	Other (Please identify):	_____	_____
	Other (Please identify):	_____	_____

**CASE SPECIFIC FACTS REGARDING
HAIR RELAXER PRODUCT USE AND INJURIES**

5. Upon information and belief, Plaintiff began using hair relaxer product(s) on or about the following date 06/16/1989 and if applicable, stopped using hair relaxer product(s) on or about the following date: 03/10/2023.

6. Upon information and belief, Plaintiff used the following hair relaxer product(s), which Plaintiff contends caused and/or contributed to their injury(ies) and brings claims against the following Defendants:

Defendant	Product List (Select All Applicable Products)
<u>AFAM Concept, Inc.</u> <u>d/b/a JF Labs, Inc.</u>	Hawaiian Silky - Crème Conditioning No Lye Silky Smooth Sheen Relaxer
	Hawaiian Silky - Herbal No Lye Conditioning Relaxer System with Tea Tree & Avocado Oil - 2 Applications
	Vitale - Olive Oil Anti-Breakage Relaxer No Base with Shea Butter - Regular Strength
	Vitale Pro - New Texture Salon Exclusive Hair Relaxer
	Vitale Mo'Body - Shea Butter Sensitive Scalp Relaxer with Oatmeal Protein
	Vitale - Life and Body - Hair Relaxer with Aloe Vera - Smooth Silky Texture
	Other (please specify):

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>	
<u>Avlon Industries, Inc.</u>		Affirm Crème Relaxer
		Affirm Sensitive Scalp Relaxer
		Affirm Dry & Itchy Scalp Relaxer
		Affirm FiberGuard Conditioning Crème Relaxer
		Affirm FiberGuard Sensitive Scalp Conditioning Relaxer
		Other (please specify):
<u>Beauty Bell Enterprises, LLC f/k/a House of Cheatham, Inc.</u>	X	Africa's Best Herbal Intensive No-Lye Relaxer System
		Originals by Africa's Best Originals Olive Oil Conditioning Relaxer
		Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil
		Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System
		Organics by Africa's Best Kids Organic Conditioning Relaxer System
		Organics by Africa's Best Kids Natural Conditioning Relaxer System
		Texture My Way Men's Texturizing Kit
		Texture My Way Women's Texturizing & Softening System
		Other (please specify):
<u>House of Cheatham, LLC</u>	X	Africa's Best Herbal Intensive No-Lye Relaxer System
		Originals by Africa's Best Originals Olive Oil Conditioning Relaxer
		Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil
		Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System
		Organics by Africa's Best Kids Organic Conditioning Relaxer System
		Organics by Africa's Best Kids Natural Conditioning Relaxer System
		Texture My Way Men's Texturizing Kit
		Texture My Way Women's Texturizing & Softening System
		Other (please specify):

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>	
<u>L'Oréal USA, Inc./ L'Oréal USA Products, Inc./ SoftSheen-Carson LLC</u>		Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer
		Dark and Lovely Beautiful Beginnings No Mistake Curl Softener
		Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer
	X	Dark and Lovely Triple Nourished Silkening Relaxer
		Optimum Salon Haircare Defy Breakage No-Lye Relaxer
		Optimum Salon Haircare Amla Legend Relaxer
		Optimum Care Bodifying Relaxer
		Optimum Multi-Mineral Reduced pH Crème Relaxer
		Bantu No Base Relaxer
		Ultra Precise No-Lye Conditioning Relaxer
		Mizani Butter Blend Relaxer
		Mizani Butter Blend Sensitive Scalp Rhelaxer
		Mizani Butterblend Prosolvent Relaxer
		Mizani Classic Rhelaxer
		Mizani Sensitive Scalp Rhelaxer
		Care Free Curl – Cold Wave Chemical Rearranger Super Strength
		Look of Radiance Permanent Crème Relaxer Kit
		Other (please specify):
<u>Luster Products Company</u>	X	Luster's Pink Oil Moisturizer No-Lye Conditioning Relaxer
		Luster's Pink Oil Moisturizer Short Looks Texturizer
	X	Luster's Pink Oil Moisturizer Smooth Touch Relaxer
		PCJ Kit
		PCJ No Lye Kit - Adult
		PCJ No Lye Kit - Children's
		ShortLooks Colorlaxer Diamond Black
		ShortLooks Colorlaxer Passion Red
		ShortLooks Colorlaxer Sable Brown
		Other (please specify):
<u>McBride Research Laboratories, Inc.</u>		Design Essentials Honey Nectar Relaxer Kit - Time Release Regular Strength
		Design Essentials Sensitive Scalp Relaxer System
		Design Essentials Regular Conditioning Relaxer

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>	
		Other (please specify):
<u>Namaste Laboratories</u>		ORS Olive Oil Built-In-Protection No-Lye Relaxer – Full Application
		ORS Olive Oil No-Mix Salon Formula Crème Relaxer
		ORS Olive Oil Ultra Nourish Crème Hair Relaxer
		ORS Olive Oil Built-In-Protection No-Lye Relaxer – New Growth
		ORS Olive Oil Zone Relaxer – Targeted Touch-Up No-Lye Hair Relaxer
		ORS Olive Oil Curl Stretching Texturizer
		ORS Olive Oil Crème on Crème Touch-Up No-Lye Hair Relaxer
		ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical
		ORS Olive Oil Texlax and Stretch Semi-Straightening System
		ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System
		ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System
		ORS HAIRrepair No-Lye Conditioning Relaxer System with Cuticle Shield
		ORS Olive Oil Professional No-Lye Relaxer Kit
		ORS Olive Oil Professional Crème Relaxer
		Namasté Salon System Triple Emulsion Relaxer
		Namasté Salon System Crème Relaxer
		Namasté Salon System Conditioning Sensitive Scalp No-Lye Relaxer
		Namasté Salon System Crème Relaxer Salon Trial Pack
		(Other (please specify):
<u>Revlon, Inc./ Revlon Consumer Products Corporation/ Revlon Group Holdings LLC/ Revlon</u>		African Pride – No Lye Relaxer Kit
		African Pride – No Base Relaxer
		African Pride – Multi Length Texturizer Kit
		African Pride – Dream Kids No Lye Relaxer Kit
		All Ways Natural – No Lye Conditioning Crème Relaxer Kit
		Aroschi Aromaphoric Relaxer System
		Crème Of Nature Relaxer Cream

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	Crème Of Nature Relaxer Kit Argan Oil
	Crème of Nature Herbarich Conditioning Crème Relaxer System Kit
	Crème of Nature Herbarich Conditioning Crème Relaxer and Texturizing System
	Crème of Nature Herbarich No Base Relaxer
	Crème of Nature No Base Relaxer
	Crème of Nature No Lye Relaxer
	Crème of Nature Sodium Relaxer Kit
	Crème Of Nature Cni No Lye Relaxer
	Crème Of Nature Cni Sunflower & Coconut Oil - Creme
	Crème Of Nature Eden Relaxer
	Fabulaxer No-Lye Relaxer
	Fabulaxer Gro-7
	Revlon Realistic No-Base Relaxer
	Revlon Realistic No Lye Relaxer Kit
	Other (please specify):
<u>Strength of Nature, LLC</u>	African Pride Olive Miracle Deep Conditioning Crème-on-Crème No Lye Relaxer 8 Salon Pack Touch-Ups
	African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer
	African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner
	African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application
	African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up
	African Pride Shea Miracle Texture Softening Elongating System
	African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit
	African Pride Dream Kids Olive Miracle Relaxer
	African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit
	Dr. Miracle's No Lye Relaxer Kit
	Dr. Miracle's New Growth No-Lye Relaxer Kit
	Elasta QP Normal Relaxer Kit
	Elasta QP Normal Relaxer Kit 2 Applications
	Elasta QP Resistant Relaxer Kit

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	Elasta QP Sensitive Scalp Kit 12 Application Economy Pack
	Elasta QP Sensitive Scalp Kit – 4 Applications
	Elasta QP No Base Crème Relaxer
	Elasta QP SOY OYL No-Base Relaxer
	Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit
	Elasta QP No-Base Relaxer
	Elasta QP Extra Body No-Base Regular Relaxer
	Elasta QP Extra Body No-Base Super Relaxer
	Gentle Treatment No-Lye Relaxer Gray Kit
	Gentle Treatment No-Lye Relaxer
	Just For Me Relaxer 1 Complete Touch Up Relaxer
	Just For Me 4 Application Salon Pack Relaxer
	Just For Me No-Lye Conditioning Crème Relaxer Kit
	Just For Me No-Lye Conditioning Crème Relaxer Kit with Coil & Curl Cream
	Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturize Lotion
	Just For Me No-Lye Texture Softener System
	Just For Me No-Lye Texture Softener System with Hair & Scalp Butter
	Motions Classic Formula Smooth & Silken Hair Relaxer
	Motions Professional 12-Application Salon Pack
	Motions Silkening Shine No Lye Relaxer Kit
	Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application
	Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application
	Profectiv Procision Relaxer Kit Regular
	Profectiv Relax and Refresh Kit Auburn Spice
	Profectiv Relax and Refresh Kit Cherry Fusion
	Profectiv Relax and Refresh Kit Jet Black
	Profectiv Relax and Refresh Kit Mahogany Brown
	Profectiv Relax and Refresh Kit Silky Black
	Pro-Line Comb Thru Texturizer Kit

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	SmartPerm No-Lye Anti-Breakage Relaxer System
	SmartPerm No-Lye Anti-Breakage New Growth Relaxer System, Smart Grow Stimulator
	SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit, 4 Applications
	Smart Perm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications
	S&B® Botanicals™ 2 Application Relaxer
	S&B® Botanicals™ No-Lye Sensitive Scalp Relaxer, 1-App
	S&B® Botanicals™ No-Mix Texturizer 2-App, with Deep Conditioner
	S&B® Botanicals™ No-Mix Texturizer 2-App
	S&B® Botanicals™ Relaxer 8-Touch Up
	Soft & Beautiful No-Lye Crème Relaxer
	Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System
	TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer
	TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, 2 Applications
	TCB No-Base Crème Hair Relaxer with Protein & DNA
	UltraSheen Supreme Conditioning No-Lye Relaxer
	UltraSheen Ultra Moisturizing No-Lye Relaxer
	UltraSheen Ultra Moisturizing No-Lye Relaxer, with Keratin
	Other (please specify):

7. Other manufacturer(s)/product(s) used by Plaintiff not identified above:

8. Plaintiff's use of Defendant(s) hair relaxer product(s) caused serious injuries and damages including but not limited to the following:

	Uterine Cancer
X	Endometrial Cancer
	Ovarian Cancer
	Other injuries and/or additional details (please specify):

9. Approximate date(s) of diagnosis (injury(ies)), if applicable at this time, that form(s) the basis of Plaintiff's claim(s): 05/03/2023

**CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND
INCORPORATED IN THIS LAWSUIT**

10. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth fully herein, all common factual allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060.

11. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:

X	Count I – Negligence and/or Gross Negligence
X	Count II – Negligent Misrepresentation
X	Count III – Negligence <i>Per Se</i>
X	Count IV – Strict Liability: Design Defect
X	Count V – Strict Liability: Failure to Warn
X	Count VI – Breach of Implied Warranty of Merchantability/ Fitness for a Particular Use
X	Count VII – Breach of Express Warranty under state law and the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 et seq.
X	Count VIII – Fraud/ Fraudulent Misrepresentation Count IX – Fraudulent Concealment
X	Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims
X	Count XI – Unjust Enrichment
	Count XII – Wrongful Death
	Count XIII – Survival Action
	Count XIV – Loss of Consortium
X	Count XV – Punitive Damages

	Other Causes of Action:
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12. Consortium Claim(s) (if applicable): The following individual(s) allege(s) damages for loss of consortium: N/A.

13. Survival and/or Wrongful Death Claim(s) (if applicable): The following individual(s) allege(s) damages for survival and/or wrongful death: .

JURY DEMAND

Plaintiff(s) demand(s) a trial by jury as to all claims in this action.

Dated this the 29th day of April, 2023.

RESPECTFULLY SUBMITTED
ON BEHALF OF THE PLAINTIFF(S),

/s/ Jennifer Hoekstra

Jennifer Hoekstra, LA Bar No. 31476
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